

RAYMOND AND RAYMOND

ATTORNEYS AT LAW

**7 GLENWOOD AVENUE, 4th FLOOR, STE. 408
EAST ORANGE, NEW JERSEY 07017**

TELEPHONE: (973) 675-5622

TELEFAX: (408) 519-6711

EMAIL: herbertraymond@gmail.com

January 20, 2021

Honorable Vincent Papalia, U.S.B.J.
U.S. Bankruptcy Court
50 Walnut Street, 3rd Floor
Newark, NJ 07102

Re: Estate of Francis Avella
18-30162
Chapter 13

Proceeding: Specialized Loan Servicing's Stay Relief Motion
Hearing Date: January 21, 2021

Dear Judge Papalia:

Please accept this late response and letter in lieu of a more formal response to the above matter.

The debtor passed away in late 2020. I have currently been working on behalf of the estate to address the arrears in the matter. It is believed that there may be life insurance funds that can be used to address this and other arrears on another mortgage on another property, and with the trustee as well, both of whom presently have default certifications pending for February 18, 2021.

I would therefore request that this matter also be carried to the February 18th date as well so all matters can be heard and dealt with at once. At that time it is hoped that the estate will have received the insurance funds or will have information about their imminent receipt.

For the foregoing reasons, I respectfully request that the court mark this matter as contested or adjourned to February 18th.

Respectfully Submitted,

/s/ HERBERT B. RAYMOND, ESQ.

Herbert B. Raymond, Esq.